



September 18, 2023

Via ECF

The Honorable George B. Daniels
United States District Court
Southern District of New York
500 Pearl Street
New York, NY 10007

Re: **KRISTINA MIKHAYLOVA V. BLOOMINGDALE'S, INC., et al.**
Case No. 19-8927

Dear Judge Daniels,

I represent Plaintiff, Kristina Mikhaylova in the above-referenced matter. With the consent of Defendants' counsel and for the reasons set forth below, I respectfully request for a one (1) day extension to the Defendants' Motion for Summary Judgment briefing deadlines. This is Plaintiff's fifth and final request. Your Honor previously granted Plaintiff's fourth request. (Dkt. No. 121).

I respectfully make this request because a modestly different version of the Defendants' filed 56.1 Undisputed Facts was previously provided to our office in word format some time ago. By happenstance while finalizing our opposition I realized the error and have been vigorously working to fix the discrepancy to meet the deadline today. However, out of an abundance of caution I am requesting a one-day extension to file our opposition to not prejudice my client as well as an additional one-day extension for Defendants to file their Reply as set forth below.

Accordingly, I respectfully request the following briefing schedule:

	Current Deadline	Proposed Deadline
Plaintiff's opposition due	September 18, 2023	September 19, 2023
Defendants' reply due	October 2, 2023	October 3, 2023

I thank Your Honor for your consideration in this matter.

Respectfully submitted,

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cc: Via ECF

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